

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PEANUTS WORLDWIDE LLC,

Plaintiff,

V.

THE PARTNERSHIPS and  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE "A",

Defendant

) Case No.: 1:21-cv-05863

) District Judge: Hon. Andrea R. Wood

## Declaration of Junjie Deng in Support of Opposition to Entry of Permanent Injunction

1. I, Junjie Deng, am authorized to speak on behalf of Yingsheji  
Jiatingyongpinyouxiangongsi (“Yingsheji”), Defendant in this case.
2. I am over the age of 18.
3. I have personal knowledge of all of the facts set forth therein and personal knowledge that  
all of those facts are true and correct, and if called upon, I could and would testify  
competently to them.
4. Yingsheji is a Chinese company with three employees.
5. Yingsheji operates an Amazon store through which it sells products under the brand name  
CHOXILA.
6. Based on the information provided by Plaintiff, it is my understanding that the product at

issue is Amazon ASIN#B09FLJ621M.

7. Yingsheji has only sold two of the products associated with ASIN#B09FLJ621M.
8. The first sale it made of that product was to an account associated with the address 300 S. Wacker Dr. STE 2500, Chicago, IL 60606.
9. The second sale it made of that product was to an account associated with an address in California.
10. Exhibit A to this declaration is a true and correct copy of an Amazon Business Report showing the two sales.
11. Exhibits B and C to this declaration are true and correct copies of the Chicago and California Amazon Orders, respectively.
12. Upon receiving the complaint about using images of the accused product, Yingsheji was concerned about having any images of the product for fear of it increasing liability. Therefore the images were removed from the Amazon listing in Exhibits B and C to ensure that Yingsheji would not inadvertently subject itself to further liability.
13. Exhibits D and E to this declaration are true and correct copies of the Amazon transactions.
14. The retail price charged by Yingsheji for each product was \$29.99.
15. Yingsheji does not and did not manufacture any of the products associated with ASIN#B09FLJ621M.
16. Yingsheji does not have and has never maintained any inventory of any of the products associated with ASIN#B09FLJ621M.
17. The bank account for Yingsheji's Amazon Store is currently frozen.
18. Yingsheji needs the money in the account purchase other products such as foam cleaners,

watermelon cutters, pineapple cutters and utensils, as well as to pay employees' salaries.

19. Exhibit F is a true and correct copy of all of the products that Yingsheji has sold or offered to sell in 2021.

20. As shown in Exhibit F, the total sales volume for the Yingsheji Amazon store in 2021 was approximately [REDACTED]

21. I declare under the laws of the United States of America and under penalty of perjury that the foregoing is true and correct.

Date: 12/15/21

Signature: 邓俊杰

Typed: Junjie Deng